IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

Missouri Association of School)
Librarians, et al.,)
)
	Plaintiffs,)
)
V.		No. 4:23-cv-00536-SRB
)
Jean Peters Baker, et al.,)
)
	Defendants.	

PLAINTIFFS' MOTION TO REMAND

Pursuant to 28 U.S.C. § 1447, Plaintiffs move this Court for an order remanding the case back to the Circuit Court of Jackson County, Sixteenth Judicial Circuit. For the reasons provided in the accompanying Suggestions in Support, remand is appropriate because there is no federal-question jurisdiction. Additionally, because there was no objectively reasonable basis for removal, an award of attorneys' fees is appropriate.

Respectfully submitted,

/s/ Gillian R. Wilcox Gillian R. Wilcox, #61278 Jason Orr, #56607 ACLU of Missouri Foundation 406 W. 34th Street, Suite 420 Kansas City, MO 64111 Phone: (816) 470-9938

CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and a copy was made available to all electronic filing participants:

/s/ Gillian R. Wilcox